

EXHIBIT A

Eugene P. Ramirez (State Bar No. 134865)
epr@manningllp.com
Craig Smith (State Bar No. 265676)
ges@manningllp.com
Anita Clark (State Bar No. 32015)
akc@manningllp.com
MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
801 S. Figueroa St., 15th Floor
Los Angeles, California 90017-3012
Tel: (213) 624-6900 Fax: (213) 624-6999

ANAHEIM CITY ATTORNEY'S OFFICE
MOSES W. JOHNSON, IV (SBN 118769)
Assistant City Attorney
E-mail: mjohnson@anaheim.net
200 S. Anaheim Boulevard, Suite 356
Anaheim, California 92805
Tel: (714) 765-5169 Fax: (714) 765-5123

Attorneys for Defendants, CITY OF
ANAHEIM, JORGE CISNEROS; PAUL
DELGADO; BRETT HITMAN; KENNETH
WEBER; and CAITLIN PANOV

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOHANNA LOPEZ, et al.,
Plaintiffs,
v.

CITY OF ANAHEIM; CITY OF
SANTA ANA; DAVID VALENTIN;
JORGE CISNEROS; PAUL
DELGADO; BRETT HEITMAN;
KENNETH WEBER; CAITLIN
PANOV; Does 1-10, ,

Defendants.

Case No.: 8:22-cv-01351-JVS-ADS

**DEFENDANT CITY OF
ANAHEIM'S INITIAL
DISCLOSURES**

Scheduling Conf.
Date: October 17, 2022
Time: 10:30 a.m.
Ctrm: 10C

Action Filed: July 21, 2022
Trial Date: None set

Pursuant to FRCP 26(a)(1), Defendants, CITY OF ANAHEIM, JORGE
CISNEROS; PAUL DELGADO; BRETT HITMAN; KENNETH WEBER; and
CAITLIN PANOV, makes the following initial disclosures:

1 1. Witnesses. Defendants' witnesses are:

2 All Witnesses identified in APD Police Reports GO# 2021-142831 (OIS
3 open investigation), GO#21-142757 (stolen vehicle report), Santa Ana Police
4 Report #21-020830, OCDA OIS Investigation #21-004162 (not complete), DOJ
5 #BI-RI2021-00030 (OIS not complete), Crime Lab FR #21-52738 and Coroner's
6 Report #21-05765-MT, including, but not limited to:

7 1) Paul Delgado, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
8 765-1900

9 2) Kenneth Weber, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
10 765-1900

11 3) Catalin Panov, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
12 765-1900

13 4) Brett Heitmann, former APD Police Officer, 425 S. Harbor Blvd.,
14 Anaheim, CA 92005, (714) 765-1900

15 5) Jorge Cisneros, APD Chief of Police, 425. S. Harbor Blvd., Anaheim,
16 CA 92805 (714) 765-1900

17 6) Garret Melberg, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
18 765-1900

19 7) Phillip Vargas, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
20 765-1900

21 8) Ricky Reynoso, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
22 765-1900

23 9) Brandon Mullins, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,
24 (714) 765-1900

25 10) Ernesto Sena, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
26 765-1900

27 11) Frank Ramirez, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,
28 (714) 765-1900

1 12) James Lopez, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
2 765-1900

3 13) Steve Salicos, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
4 765-1900

5 14) Michael Williams, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,
6 (714) 765-1900

7 15) Curt Ledesma, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
8 765-1900

9 16) Brent Sporn, 370 S. Wilde St., Anaheim, CA 92802 (714) 240-3473

10 17) OCFA Captain/Paramedic Christopher Jaime, 120 W. Walnut St.,
11 Santa Ana, CA 92701 (714) 567-3255

12 18) Kenny Aguilar, SAPD Officer, 60 Civic Center Plaza, Santa Ana, CA
13 92701 (714) 245-8665

14 19) Nelson Menendez, SAPD Officer, 60 Civic Center Plaza, Santa Ana,
15 CA 92701 (714) 245-8665

16 20) Luis Galeana, SAPD Corporal, 60 Civic Center Plaza, Santa Ana, CA
17 92701 (714) 245-8049

18 21) Manuel Pardo, SAPD Officer, 60 Civic Center Plaza, Santa Ana, CA
19 92701 (714) 245-8049

20 22) Sergio Martinez, SAPD Officer, 60 Civic Center Plaza, Santa Ana, CA
21 92701 (714) 245-8049

22 23) Randy Lucio, 1245 W. Santa Ana Blvd., Santa Ana, CA 92703, (714)
23 542-8428

24 24) Dr. Yong-son Kim, OC Coroner's Office, 1071 W. Santa Ana Blvd.,
25 Santa Ana, CA 92703

26 25) Vanessa Havro, OC Crime Lab, 320 N. Flower St., Santa Ana, CA
27 92703 (714) 834-4510

28 26) Sharon Mae Marissa Cortez, 678 S. Breezy Way, Orange, CA 92869

1 (714) 473-2635

2 27) Alex Hernandez Cortez, 678 S. Breezy Way, Orange, CA 92869 (714)
3 814-5358

4 28) Jeff Mundy, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
5 765-1900

6 29) Jimmy Elliott, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
7 765-1900

8 30) Michael Dohmann, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,
9 (714) 765-1900

10 31) Anthony McGlade, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,
11 (714) 765-1900

12 32) Nathaniel Cox, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
13 765-1900

14 33) John Duran, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
15 765-1900

16 34) Mark Gell, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
17 765-1900

18 35) Jared Dewald, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
19 765-1900

20 36) Shane Spielman, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,
21 (714) 765-1900

22 37) Sonia Cenicerros, 317 E. La Palma Ave. Anaheim, CA 92801 (714)
23 737-9232

24 38) Rossi Elena Cenicerros, 814 S. Dakota St. Anaheim, CA 92805 (714)
25 678-8952

26 39) Joseph Gross, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
27 765-1900

28 40) Antonio Lopez, Plaintiff

1 41) Johnanna Lopez, Plaintiff

2 42) April Rodriguez, Plaintiff

3 43) Rachel Perez, Plaintiff

4 44) Rocio Flores, Plaintiff

5 45) Minor Plaintiffs M.R., B.L., J.L., and S.L.

6 46) David Valentin, SAPD Chief of Police, 60 Civic Center Plaza, Santa
7 Ana, CA 92701

8 47) Ryan Hunter, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
9 765-1900

10 48) Brian Leist, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
11 765-1900

12 49) Jeff Hemerson, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
13 765-1900

14 50) Eric Trapp, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)
15 765-1900

16 51) Abelardo Oropeza, SAPD Sgt., 60 Civic Center Plaza, Santa Ana, CA
17 92701

18 52) Johnathan Hernandez, SA City Councilmember, 22 Civic Center
19 Plaza, Santa Ana, CA 92701 (714) 647-6900

20 53) All Witnesses disclosed by the Plaintiffs and Co-Defendants.

21 2. Documents. Defendants provide the following description of their
22 documents required by FRCP 26(a)(1)(B):

23 The complete APD Police Report GO# 2021-142831 (OIS open
24 investigation), GO#21-142757 (stolen vehicle report) and DOJ #BI-R!2021-
25 00030 (OIS investigation not complete)/OCDA Investigation #21-004162 (OIS
26 investigation not complete), will be produced to Plaintiffs' counsel once
27 completed and a Protective Order is entered by the Court, including, but not
28 limited to the following documents:

- 1) OCDA #21-004162 (OIS Investigation, not complete)
- 2) DOJ #BI-RI2021-00030 (OIS Investigation/Report, not complete)
- 3) SAPD #21-020830
- 4) Interview of APD Inv. Garrett Melberg
- 5) Interview of APD Inv. Phil Vargas
- 6) Interview of APD Inv. Ricky Reynoso
- 7) Interview of OCFA Captain/Paramedic Christopher Jaime
- 8) Interview of APD Officer Brandon Mullins
- 9) Interview of APD Officer Ernesto Sena
- 10) Interview of SAPD Officer Kenny Aguilar
- 11) Interview of SAPD Officer Nelson Menendez
- 12) Interview of APD Officer Frank Ramirez
- 13) Interview of APD Officer James Lopez
- 14) Interview of APD Officer Steve Salicos
- 15) Interview of APD Officer Mike Williams
- 16) Interview of SAPD Corporal Luis Galeana
- 17) Interview of APD Sgt. Curt Ledesma
- 18) Interview of SAPD Officer Manuel Pardo
- 19) Interview of SAPD Officer Sergio Martinez
- 20) Interview of witness Brentt Sporn
- 21) Interview of witness Randy Lucio
- 22) Black Guess bag and plastic water bottle-OC Crime Lab
- 23) Handwritten Suicide Note/photo-OC Crime Lab
- 24) Drug Paraphernalia-OC Crime Lab
- 25) Autopsy Report by Coroner Yong-son Kim Case #21-05765-TM
- 26) OC Crime Lab Reports FR#21-52851, including, but not limited to,
Tox Exam Report by Forensic Scientist Vanessa Havro
- 27) Autopsy Photos (194) OC Crime Lab

- 1 28) Post Embalming Photos (54) OC Crime Lab
- 2 29) Officer Processing Photos (108) OC Crime Lab
- 3 30) Scene Photos (117) OC Crime Lab
- 4 31) Scene Photos (289) OC Crime Lab
- 5 32) Vehicle Processing Photos (47) OC Crime Lab
- 6 33) Aerial Photos/Videos by SAPD
- 7 34) GO#21-142831 (OIS open investigation)
- 8 35) CAD 21-142831
- 9 36) GO#21-142757 (stolen vehicle report)
- 10 37) CAD 21-142757
- 11 38) APD BWC-Officers Paul J. Delgado, Catalin M. Panov, Kenneth A.
12 Weber, and Sgt. Mundy, John Duran, James R. Elliott (Angel
13 helicopter video), Vicent Nguyen, Ryan Hunter, James Lopez, Dale
14 Miller, Anthony McGlade, Brandon Mullins, Ernesto J. Sena, Michael
15 R. Dohmann, Michael Williams, Frank Ramirez, Nathaniel Cox, Randy
16 N. Sany, Patrick Bradley, Phillip M. Vargas, Ricardo Reynoso,
17 Lorenzo Uribe and Joseph Gross
- 18 39) Booking Photos of Brandon Lopez
- 19 40) Criminal history-Brandon Lopez, including, but not limited to,
20 OCSC Cases 21NF0446, 20NM01327, 19WM05718 and 17NM08088
21 and related Warrants.
- 22 41) Critical Incident Video #21-142831:
23 <https://www.youtube.com/watch?v=iLmnmgjeHik&t=258s>
- 24 42) Interview of Officer Panov by Special Agents Estrada and Cryar
- 25 43) Interview of Officer Weber by Special Agents Estrada and Carlos
- 26 44) Interview of Officer Delgado by Special Agents Cryar and Carlos
- 27 45) Interview of Officer Heitmann by Special Agents Black and Estrada
- 28 46) APD Dispatch audio

- 1 47) APD Radio traffic
- 2 48) 2-Orange-3 Radio traffic audio
- 3 49) OC Crime Lab Reports FR #219-52738
- 4 50) OnSceneTV video by Brent Sporn
- 5 51) APD GO#2021-6797 (211 PC Robbery)
- 6 52) Declaration in Support of Arrest Warrant (GO#21-6797)
- 7 53) APD GO#2021-11552 (211 PC Robbery)
- 8 54) APD GO#2021-13451 (211 PC Robbery)
- 9 55) APD GO#2021-14211 (211 PC Robbery)
- 10 56) APD GO#2020-17378 (Domestic Violence)
- 11 57) SAPD Report 2021-20827
- 12 58) SAPD Traffic Collision Report 2021-20871
- 13 59) SAPD CAD
- 14 60) SAPD BWC (numerous officers, including, but not limited to Sgt.
15 Oropeza, Officers Sanudo, Hatziefstratiou, Arias).
- 16 61) SAPD Drone Photos and Videos
- 17 62) SAPD Scene Photos
- 18 63) OCFA Report Incident #21-119028
- 19 64) All Documents disclosed by the Plaintiffs and Co-Defendants.
- 20 3. Damages. None, except costs and attorney's fees.
- 21 4. Insurance. Defendant City of Anaheim is self-insured for \$1
22 million.

23 Defendants maintain the right to supplement these disclosures to the extent
24 new witnesses, documents and evidence may be obtained or discovered during
25 the discovery process. Pursuant to the Court's entry of a protective order in this
26 action and completion of the investigations, Defendants will amend their initial
27 disclosures and send a copy of the completed DOJ/DA's investigations and APD
28 reports/BWCs to Plaintiffs' counsel.

1 Dated: October 10, 2022

ROBERT FABELA, CITY ATTORNEY

3 Bv: /s/ Moses W. Johnson, IV

4 Moses W. Johnson, IV
5 Assistant City Attorney
6 Attorneys for Defendants
7 CITY OF ANAHEIM, JORGE
8 CISNEROS; PAUL DELGADO;
9 BRETT HITMAN; KENNETH WEBER;
10 and CAITLIN PANOV

11 146895

PROOF OF SERVICE

Lopez v. City of Anaheim;

USDC, Central Dist. Case No.: 8:22-cv-01351-JVS-ADS

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 200 S. Anaheim Boulevard, Suite 356, Anaheim, California 92805.

On October 10, 2022, I served the foregoing document described as:
DEFENDANT CITY OF ANAHEIM'S INITIAL DISCLOSURES

on interested parties in this action by placing the original/a true copy thereof enclosed in sealed envelope(s) addressed as follows:

SEE ATTACHED SERVICE LIST

☒ BY MAIL: As follows: I am readily familiar with the City's practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice correspondence is deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Anaheim, California in the ordinary course of business. The correspondence described above was placed for deposit at 200 S. Anaheim Boulevard, Anaheim, California 92805, on the date set forth above.

☒ BY ELECTRONIC MAIL TRANSMISSION: By electronic mail submission by transmitting a PDF format copy of such document(s) to each such person at the email addresses listed. The document(s) was transmitted by electronic transmission and such transmission was reported as complete and without error.

☐ BY FACSIMILE: I caused the contents of said envelope to be delivered by facsimile transmission to the above addressee(s).

☐ BY METHOD OF OVERNIGHT DELIVERY: I caused such envelope(s) to be delivered via Express Mail or other method of delivery providing for overnight delivery to the addressee(s) designated.

I declare under penalty of perjury that the above is true and correct.

Executed at Anaheim, California.

/s/ Maria Segovia
Maria Segovia

SERVICE LIST

Lopez v. City of Anaheim;

USDC, Central Dist. Case No.: 8:22-cv-01351-JVS-ADS

LAW OFFICES OF DALE K. GALIPO *Attorneys for Plaintiffs*

Dale K. Galipo, Esq. (SBN

144074)dalekgalipo@yahoo.com

Renee V. Masongsong

Rvalentine@galipolaw.com

21800 Burbank Blvd., Ste 310

Woodland Hills, CA 91367

Tel: (818) 347-333; Fax: (818) 347-4118

Eugene P. Ramirez (State Bar No. 134865)

Co-Counsel for Defendants

epr@manningllp.com

Craig Smith (State Bar No. 265676)

ges@manningllp.com

Anita Clark (State Bar No. 32015)

akc@manningllp.com

MANNING & KASS

ELLROD, RAMIREZ, TRESTER LLP

801 S. Figueroa St., 15th Floor

Los Angeles, California 90017-3012

Telephone: (213) 624-6900

Facsimile: (213) 624-6999

Christopher Lee, Esq.

clee@everettdorey.com

EVERETT DOREY LLP

18300 Von Karman Ave., Suite 900

Irvine, CA 92612